June 29, 2005

Docket Clerk
Marketing Order Administration Branch
Fruit and Vegetable Programs, AMS, USDA
1400 Independence Ave., SW
STOP 0237
Washington, DC 20250-0237
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RE: Docket Number FV05-996-2PR, June 21,2005, Vol. 70, No.118

Change in Minimum Quality and Handling Standards for Domestic and Imported Peanuts Marketed in the United States

## Dear Deputy Administrator:

The American Peanut Shellers Association (APSA) is an association of commercial peanut shellers in the United States. Our membership handles approximately 90% of the peanuts grown in the United States. APSA appreciates the opportunity to provide comments on the USDA's Proposed Rule for "high moisture" grading of farmers stock peanuts. We believe that the increase in the level of moisture content at inspection will allow the industry the flexibility to develop new drying technologies, thereby increasing handling efficiencies and reducing costs to the industry. Therefore, we support the proposed rule.

The willingness of USDA to work through the many related issues necessary to coordinate this change is greatly appreciated.

Sincerely,

John T. Powell

Executive Director

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